

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOCELYN PIERRE,

Plaintiff,

-against-

DYNASTY AND FLAME INC. AND  
CHU SHEN REALTY INC.,

Defendants.

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**MOTION FOR DEFAULT  
JUDGMENT**

*Civil Action No.:*  
1:22-cv-3232-LGS

**PLEASE TAKE NOTICE**, Plaintiff moves this court for a judgment by default in this action, and shows that the complaint in the above case was filed in this court on April 20, 2022; the summons and complaint were duly served on the Defendants Dynasty and Flame Inc. and Chu Shen Realty Inc. through the secretary of state on May 24, 2022; no answer or other defense has been filed by the Defendants Dynasty and Flame Inc. and Chu Shen Realty Inc.; a certificate of default was entered in the civil docket in the office of this clerk on September 6, 2022; Defendants Dynasty and Flame Inc. and Chu Shen Realty Inc. are not in military service and are not an infant or incompetent as appears in the affirmation of Bradley G. Marks submitted herewith.

**WHEREFORE**, Plaintiff moves that this Court enter a judgment as follows:

1. That Defendants Dynasty and Flame Inc. and Chu Shen Realty Inc. take all steps necessary to make their premises compliant with the Americans with Disabilities Act, New York State Human Rights Laws, and New York City Human Rights Laws.

2. That the Plaintiff be awarded one thousand dollars (\$1,000) in compensatory damages based on the Defendants' violation of the New York City Human Rights Law and the New York State Human Rights Law.
3. That the Defendants Dynasty and Flame Inc. and Chu Shen Realty Inc. comply with terms of the Final Judgment within sixty (60) days of the entry of the judgment.
4. That this Honorable Court retain jurisdiction relating to the Plaintiff's attorneys' fees costs and said motion for the same shall be filed within ninety (90) days of entry of this Final Judgment.
5. For such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
September 12, 2022

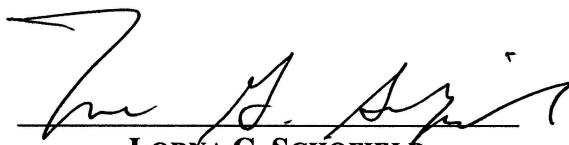
THE MARKS LAW FIRM

By: 

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Application DENIED without prejudice. By **September 16, 2022**, Plaintiff shall file a proposed order to show cause for default judgment as required by the Court's Individual Rules and shall file a supplemental affidavit addressing Plaintiff's request for damages, as required by part 2(a)(v) of the Default Judgment Procedure in the Court's Individual Rules.

Dated: September 13, 2022  
New York, New York

  
**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**